

UNITED STATES DISTRICT COURT
DISTRICT OF PUERTO RICO

UNITED STATES OF AMERICA,
Plaintiff,

v.

a. \$16,384.59 in funds from bank account number Account 9116 held in the name of Pedro Pastrana, at Cooperativa La Puertorriqueña, in Rio Piedras, Puerto Rico.

b. \$10,266.26 in funds from bank account number 9696 held in the name of JCPY, Inc., at Cooperativa La Puertorriqueña, in Rio Piedras, Puerto Rico.

c. 1998 Mako Vessel 25' Hull Number: MRKCA095C898, Registration Number: PR2619AD, with two (2) Mercury 200hp outboard motors, and one (1) 2005 Star Fire, Inc., trailer.

Defendants *In Rem*.

Civil No.:

VERIFIED COMPLAINT FOR FORFEITURE IN REM

TO THE HONORABLE COURT:

COMES NOW, the United States of America brings this Verified Complaint for Forfeiture *In Rem* pursuant to Supplemental Rule G(2) of the Federal Rules of Civil Procedure, Supplemental Rules for Admiralty or Maritime Claims and Asset Forfeiture Actions, and alleges as follows:

Nature of the Action

1. This is a civil action *in rem* pursuant to 18 U.S.C. §§ 371, 1347, 1349, 1951, 1956, and 1962.

Jurisdiction and Venue

2. This Court has subject matter jurisdiction over an action commenced by the United States pursuant to 28 U.S.C. § 1345; over an action for forfeiture pursuant to 28 U.S.C § 1355; and over this particular action pursuant to 18 U.S.C. §§ 371, 1347, 1349, 1951, 1956, and 1962.
3. Venue is proper in this district and the Court has *in rem* jurisdiction over the defendants *in rem* pursuant to 28 U.S.C. §§ 1355(b)(1)(A) and 1395(b) because the acts and omissions giving rise to the forfeiture occurred in this district.

The Defendants In Rem

4. The Defendants *In Rem*: \$16,384.59 in funds from bank account number Account 9116 held in the name of Pedro Pastrana, at Cooperativa La Puertorriqueña, in Rio Piedras, Puerto Rico; \$10,266.26 in funds from bank account number 9696 held in the name of JCPY, Inc., at Cooperativa La Puertorriqueña, in Rio Piedras, Puerto Rico, and a 1998 Mako Vessel 25' Hull Number: MRKCA095C898, Registration Number: PR2619AD, with two (2) Mercury 200hp outboard motors, and one (1) 2005 Star Fire, Inc., trailer, were seized by the Federal Bureau of Investigation (FBI) on August 12 and 15, 2022, in San Juan, Puerto Rico.
5. The Defendants *In Rem* are within the possession, custody, or control of the United States.

Bases for Forfeiture

6. The Defendants *In Rem* are subject to forfeiture pursuant to: 18 U.S.C. §§ 371 (Conspiracy to commit offense or to defraud United States); 1347 (Health care fraud); 1349 (Attempt and conspiracy); 1951 (Interference with commerce by

threats or violence); 1956 (Laundering or monetary instruments); and 1962(d) (Prohibited activities).

Facts Supporting Forfeiture

7. This Verified Complaint fully incorporates the facts contained in the attached Unsworn Declaration of Carlos Urrutia, Special Agent of the Federal Bureau of Investigation (FBI).

Claim for Relief

The United States of America respectfully requests that the Court issue a warrant of arrest for the Defendants *In Rem*; that due notice be given to all parties to appear and show cause why the forfeiture should not be decreed; that the Court enter judgment declaring the Defendants *In Rem* condemned and forfeited to the United States of America for disposition according to law; and that the Court grant the United States of America such other and further relief as the Court may deem just and proper, together with the costs and disbursements of this action.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 13 day of January 2023.

W. STEPHEN MULDROW
United States Attorney

/s/ Clay Rehrig
Clay Rehrig
Special Assistant United States Attorney
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VERIFIED DECLARATION

I, Clay Rehrig, Special Assistant U.S. Attorney, for the District of Puerto Rico, declare under penalty of perjury as provided by 28 U.S.C. § 1746, the following:

That the foregoing Complaint is based on reports and information furnished to me by the United States Federal Bureau of Investigation ("FBI"); that everything contained therein is true and correct to the best of my knowledge and belief.

Executed in San Juan, Puerto Rico, this 13 day of January 2023.

/s/ Clay Rehrig

Clay Rehrig

Special Assistant United States Attorney

VERIFICATION

I, Carlos Urrutia, depose and say that I am a Special Agent with the Federal Bureau of Investigation and as such have responsibility for the within action, that I have read the contents of the foregoing Verified Complaint for Forfeiture *In Rem* and, pursuant to 28 U.S.C. § 1746, verify under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information and belief.

Executed in San Juan, Puerto Rico, this 13 day of January 2023.



Carlos Urrutia, Special Agent
Federal Bureau of Investigation (FBI)